

**REMARKS**

Claims 1, 3-12, 14-23, 25-34, 36, and 37 are pending in the present application. Reconsideration of the claims is respectfully requested.

Applicants would like to thank the examiner for his courtesy in holding a telephone conference on May 5, 2004 between the examiner and the applicants' representative. During the telephone conversation, the examiner and applicants' representative discussed the patentability of the currently pending claims in light of *Himmel* (U.S. Patent No. 6,167,441) and *Tada* (U.S. Patent No. 6,237,040).

I. **35 U.S.C. § 103, Claims 1, 3-8, 10-12, 14-19, 21-23, 25-30, 32-34, and 36-37**

The examiner has rejected claims 1, 3-8, 10-12, 14-19, 21-23, 25-30, 32-34, and 36-37 under 35 U.S.C. § 103(a) as being unpatentable over *Himmel* (U.S. Patent No. 6,167,441) further in view of *Tada* (U.S. Patent No. 6,237,040). This rejection is respectfully traversed.

With regard to claim 1, the examiner states:

As to claim 1, *Himmel* teaches a method in data processing system, comprising the steps of:

receiving, from a client, a request for a host screen; navigating to the host screen; retrieving the host screen (see fig. 2, col. 4-5, *Himmel* discloses receiving a request for a host screen and retrieving the requested web page);

formatting the host screen into a formatted host screen, wherein the formatted host screen displays selectable links to other screens within a host system; and sending the formatted host screen to the client (see col. 7, lines 30-55, *Himmel* discloses retrieving a requested web page and reformatting it based on the requester type and sending it to the client).

*Himmel* fails to teach the limitations of formatting the host screen from a non-markup language. *Himmel* does teach that access to FTP sites are facilitated by the invention in *Himmel* (see col. 1-3).

However, *Tada* teaches a hypertext transmission method and apparatus for sending and receiving files other than HTML files (see abstract). *Tada* teaches formatting the host screen from a non-markup language (see figs. 1-9; col. 3-7, *Tada* discloses that an e-mail page is acquired and is converted into an HTML page for display on the mobile device).

It would have been obvious to one of ordinary skill in the art at the time of the invention to modify *Himmel* in view of *Tada* so that non-HTML files are accessed by a mobile device. One would be motivated to do so to allow accessing of FTP sites and e-mail sites.

(*Office Action* dated March 10, 2004, pages 2-3). Independent claim 1, which is representative of independent claims 12, 23, and 34, reads as follows:

1. A method in a data processing system for navigating screens in a legacy host system, comprising the steps of:
  - receiving, from a client, a request for a host screen;
  - navigating to the host screen;
  - retrieving the host screen;
  - formatting the host screen into a formatted host screen from a non-markup language to a markup language, wherein the formatted host screen displays selectable links to other screens within host system; and
  - sending the formatted host screen to the client.

One of ordinary skill in the art would not combine *Himmel* with *Tada* when each reference is considered as a whole. In considering a reference as a whole, one of ordinary skill in the art would take into account the problems recognized and solved. *Himmel* is directed towards providing customized Internet content to a requesting client device using an intercepting agent. When a client device requests a file from a web server, the agent, typically located at the web server receiving the client request, intercepts the request. The agent then detects client device capability information about the requesting client device, such as display or memory capabilities. The client request is redirected to a Uniform Resource Locator (URL) according to the detected client device capability information to retrieve a version of the requested file. (*Himmel*, col. 2, lines 25-35). Thus, the *Himmel* agent addresses customizing of the presentation of a requested web page for a particular client.

In contrast, *Tada* is directed towards enabling the automatic processing of non-HTML data (e.g., email data) even if a user terminal has only a browser that handles HTML files. (*Tada*, col. 1, lines 46-49). An HTML file is requested using the WWW browser on a user terminal apparatus. An Internet connection service provider apparatus (Internet Service Provider) using the HTML file request as a trigger automatically acquires a user's e-mail and then converts the e-mail to HTML format for storage. If e-mail is present, a markup tag to the e-mail list is added to the requested HTML file and transmitted to the user terminal apparatus. When the user selects this tag, the Internet connection service provider apparatus retrieves the corresponding e-mail HTML file and returns it to the user. (*Tada*, Abstract). Thus, *Tada* provides deferred access to non-

HTML data by allowing a link to email data that was converted to HTML format on the requested HTML file. The user must select this link to access the converted data. (*Tada*, Figures 11A-11D; col. 6, lines 43-67).

In view of the above, there is no motivation to combine the teachings of *Himmel* with *Tada* in the manner alleged by the examiner. The examiner alleges that the motivation for the alleged combination is "so that non-HTML files are accessed by a mobile device. One would be motivated to do so to allow accessing of FTP sites and email sites." However, there is no suggestion in *Himmel* that there is a need to format a screen from a non-markup to a markup language. In fact, *Himmel* is directed toward redirecting client web requests to client-tailored web pages. The reformatting agent in *Himmel* merely teaches customizing the presentation of the web page. There is no need, let alone any suggestion, to convert non-markup language to a markup language to customize the presentation of a selected web page in *Himmel*.

Moreover, there is no suggestion in *Tada* of a need to integrate the *Tada* system with a web page customization system, such as that taught by *Himmel*. *Tada* has nothing to do with detecting the capabilities of a client device and customizing a web page according to the capabilities of the client device. *Tada* is concerned with providing a means to enable the automatic processing of non-HTML data (e.g., email data), regardless of whether the data to be processed is requested by the user (*Tada*, col. 1, lines 40-43). When a user requests a web page, *Himmel* provides the user an immediate response with a customized version of the requested data. Data which is converted from non-markup language to markup language in *Tada* is provided to the user in a deferred manner, wherein the converted data is provided to the user via a link which the user must select to access the data. There is no need, let alone any suggestion in *Tada* to provide a client-tailored web page of the requested data to match the client's capabilities. Thus, the alleged motivation offered by the examiner is not based on the actual teaching of the references.

Furthermore, as noted above, there is no teaching or suggestion in the references as to the desirability of including the features from the other references. As the examiner has failed to demonstrate any motivation or incentive in the prior art to combine and modify the references so as to achieve the claimed invention, the alleged combination can

only be the result of impermissible hindsight reconstruction using applicant's own disclosure as a guide. As the present rejection is based completely on hindsight to the exclusion of what can be properly gleaned from the references by one of ordinary skill in the art, the rejection is improper and should be withdrawn.

Moreover, neither *Himmel* nor *Tada* teach the problem of the present invention or its source. The present invention recognizes the problem of accessing and navigating through various screens of a legacy host system without requiring knowledge of service specific commands. These legacy systems to which users desire access must be reformatted such that they are readable and useable by web browsers. However, even with reformatting, a user may be required to be familiar with the particular commands necessary to navigate through the various screens contained within a legacy host system. The present invention allows for navigating through multiple "screens" of a legacy application on behalf of a user without user intervention. For example, a user may make a request (such as clicking on a hyperlink) and a complete navigation sequence may be executed, from which the final screen is presented to the user. Thus, the present invention provides for formatting the legacy host screen from a nonmarkup language to a markup language in order to allow a user, without knowledge of system specific commands, to access and navigate the legacy system. Thus, one of ordinary skill in the art would not be motivated to modify *Himmel* and *Tada* in the manner required to form the solution discussed in the claimed invention when the problems addressed by the two references are reviewed when considering each reference as a whole.

Claims 3-8 and 10 are dependent claims depending from independent claim 1. Claims 14-19 and 21 are dependent claims depending from independent claim 12. Claims 25-30 and 32-33 are dependent claims depending upon independent claim 23. Claims 36 and 37 are dependent claims depending from independent claim 34. Applicants have already demonstrated claims 1, 12, 23, and 34 to be in condition for allowance. Applicants respectfully submit that claims 3-8, 10-11, 14-19, 21-22, 25-30, 32-33, and 36-37 are also allowable, at least by virtue of their dependency on an allowable claim.

Therefore, the rejection of claims 1, 3-8, 10-12, 14-19, 21-23, 25-30, 32-34, and 36-37 under 35 U.S.C. §103 has been overcome.

**II. Conclusion**

It is respectfully urged that the subject application is patentable over the cited references and is now in condition for allowance.

The examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,



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